

FILED
10/1/2025

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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

NHC LLC, a Florida limited liability
Company,

Plaintiff,

v.

CENTAUR CONSTRUCTION COMPANY
INC., an Illinois corporation, SPIRO
TSAPARAS, and PETER ALEXOPOULOS,

Defendants.

No. 1:19-cv-06332

Honorable Matthew F. Kennelly

**DEFENDANT SPIRO TSAPARAS'S SUPPLEMENTAL RESPONSE TO
PLAINTIFF'S PENDING MOTION (DKT. 647 & DKT. 786)**

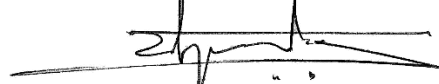
Defendant Spiro Tsaparas, pursuant to the Court's directive reflected in the hearing minutes regarding Docket 786, respectfully submits this Supplemental Response together with Exhibit 1.

On September 6, 2025, Mr. Tsaparas filed his Response to Plaintiff's pending motion (Dkt. 647 & Dkt. 786), which included Exhibit 1 containing an accounting of the transactions identified therein, prepared to the best of his memory and ability based on the records then available to him.

Since that time, additional documents have become available through materials recovered from the BOX cloud storage folder and from records obtained from Amundsen Davis. Using these newly available records, Mr. Tsaparas has been able to provide further clarification on certain transactions.

Accordingly, he now submits the same Exhibit 1 previously filed, with supplemental notes highlighted in **red font** to identify the additional information and clarifications.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Spiro Tsaparas', written over a horizontal line.

Spiro Tsaparas
Defendant, Pro Se Litigant
100 S Spring Street
Aspen, CO 81611
(312) 735-4960

Spirotsaparas.prose@outlook.com

CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2025, I served a true and correct copy of the foregoing Supplemental Response to Plaintiff's Pending Motion (Dkt. 647 & Dkt. 786), upon the following via email:

Zachary J. Watters

Vedder Price P.C.

zwatters@vedderprice.com

Daniel P. Jackson

Vedder Price P.C.

djackson@vedderprice.com

EXHIBIT 1

TRANSACTION EXPLANATIONS FROM CHART, DOCKET 647

May 9, 2023 – Zelle Instant to DEEVS – \$6,346.00

This transaction represents a bi-weekly salary payment to DeAnna Van Senus (DEEVS) pursuant to her independent contractor agreement with Mr. Tsaparas at M Sourcing, providing annual compensation of \$160,000.

Statement above is confirmed.

May 19, 2023 – Internet Banking Transfer to Tsaparas Account Ending in -8753 – \$1,246.00

This amount was transferred to Mr. Tsaparas's personal account and then directly transferred to DEEVS from account ending in -8753. It is likely this transaction occurred due to a daily Zelle transfer limit, as funds were owed to DEEVS for services rendered.

Statement above is confirmed.

May 19, 2023 – Zelle Instant to DEEVS – \$7,000.00

Salary payment to DeAnna Van Senus under her independent contractor agreement with Mr. Tsaparas at M Sourcing.

Statement above is confirmed.

June 14, 2023 – Internet Banking Transfer to Centaur Account Ending in -8746 – \$790.00

This transfer was made to fund two payments from the Centaur account: (i) AT&T – \$1,554.95, and (ii) Aetna Health Insurance – \$2,367.56. On the same day, an additional \$2,400.00 was transferred from Mr. Tsaparas's personal account to Centaur's account, for total deposits of \$4,090.00.

Statement above is confirmed.

June 14, 2023 – Internet Banking Transfer to Centaur Account Ending in -8746 – \$900.00

Same explanation as above: the transfer funded payments to AT&T and Aetna Health Insurance, with supplemental funds added from a personal account.

Statement above is confirmed.

June 20, 2023 – Internet Banking Transfer to Tsaparas Account Ending in -8753 – \$200.00

This transfer was used to complete a Venmo payment made the same day. Records are unavailable, and the purpose of the Venmo payment is unknown.

Payment made to Rosario Soto for babysitting.

June 20, 2023 – Internet Banking Transfer to Tsaparas Account Ending in -8753 – \$500.00

As above, this transfer was used to complete a Venmo payment the same day. Records are unavailable, and the purpose is unknown.

Payment made to Seth McFadden; do not recall purpose.

June 23, 2023 – Internet Banking Transfer to Tsaparas Account Ending in -8753 – \$200.00

I am unable to determine the purpose of this transaction.

Transfer made to cover account overdraft.

June 30, 2023 – Zelle Instant to DEEVS – \$6,346.00

Bi-weekly salary payment to DeAnna Van Senus.

Statement above is confirmed.

July 14, 2023 – Zelle Instant to DEEVS – \$6,346.00

Bi-weekly salary payment to DeAnna Van Senus.

Statement above is confirmed.

July 28, 2023 – Zelle Instant to DEEVS – \$6,346.00

Bi-weekly salary payment to DeAnna Van Senus.

Statement above is confirmed.

August 11, 2023 – Internet Banking Transfer to Tsaparas Account Ending in -8753 – \$2,500.00

This transfer appears to have been made to cover a shortfall for an Aetna Insurance payment of \$3,116.00.

The statement above is partially accurate; On that date, both the nanny's wages and insurance payment were due, requiring a deposit of \$2,500 to cover those obligations.

August 11, 2023 – Zelle Instant to DEEVS – \$3,800.00

Salary payment to DeAnna Van Senus under her independent contractor agreement.

Statement above is confirmed.

August 25, 2023 – Zelle Instant to DEEVS – \$6,346.00

Bi-weekly salary payment to DeAnna Van Senus.

Statement above is confirmed.

September 8, 2023 – Zelle Instant to DEEVS – \$6,346.00

Bi-weekly salary payment to DeAnna Van Senus.

Statement above is confirmed.

September 22, 2023 – Zelle Instant to DEEVS – \$6,346.00

Bi-weekly salary payment to DeAnna Van Senus.

Statement above is confirmed.

October 3, 2023 – Zelle Instant to Peter Alexopoulos – \$1,500.00

I do not recall the purpose of this specific transaction. See general note regarding transfers to Mr. Alexopoulos.

Peter asked for assistance to cover personal expenses.

October 3, 2023 – Cash Withdrawal – \$2,000.00

I do not recall the purpose of this withdrawal. See general note regarding cash withdrawals.

October 17, 2023 – Telephone Transfer to Tsaparas Account Ending in -1745 – \$100.00

I do not have any records of this transaction or the referenced account.

Transfer made to cover account overdraft.

October 27, 2023 – Zelle Standard to All Seasons Auto – \$900.00

Car wash and dent repairs.

Statement above is confirmed.

October 27, 2023 – Zelle Standard to Seth McFadden – \$2,839.00

I do not have records of this transaction nor do I specifically recall its purpose. Mr. McFadden occasionally performed work for me, and I compensated him for those services, but I cannot confirm the details of this particular payment.

Mechanics work for the Denali. Payment was made to compensate Seth for repairing the vehicle. (Seth is a mechanic)

October 27, 2023 – Cash Withdrawal – \$5,000.00

I do not recall the purpose of this withdrawal. See general note regarding cash withdrawals.

\$1,400 of this was used to pay the Nanny. I do not recall the purpose and the use of the \$3,600.

October 27, 2023 – Zelle Instant to DEEVS – \$6,346.00

Bi-weekly salary payment to DeAnna Van Senus.

Statement above is confirmed.

October 30, 2023 – Transfer to Venmo – \$950.00

I do not possess records of this Venmo transaction and do not recall its specific purpose.

This payment was made to Mark Hunt as a reimbursement for a past due telephone bill that he had covered on my behalf the previous month.

October 30, 2023 – Cash Withdrawal – \$2,500.00

I do not recall the purpose of this withdrawal. See general note regarding cash withdrawals.

November 3, 2023 – Zelle Instant to DEEVS – \$6,346.00

Bi-weekly salary payment to DeAnna Van Senus.

Statement above is confirmed.

November 6, 2023 – Cash Withdrawal – \$8,000.00

I do not recall the purpose of this withdrawal. See general note regarding cash withdrawals.

November 7, 2023 – Zelle Instant to All Seasons Auto – \$350.00

Payment for vehicle services.

Statement above is confirmed.

November 10, 2023 – Wire to Aetna Life Insurance – \$2,367.00

Health insurance premium.

Statement above is confirmed.

November 10, 2023 – Cash Withdrawal – \$17,000.00

I do not recall the purpose of this withdrawal. See general note regarding cash withdrawals.

November 13, 2023 – Zelle Instant to Peter Alexopoulos – \$100.00

I do not recall the purpose of this transaction. See general note regarding transfers to Mr. Alexopoulos.

Peter asked for assistance to cover personal expenses.

November 13, 2023 – Transfer to GEICO – \$148.06

Vehicle insurance premium.

Statement above is confirmed.

November 13, 2023 – Transfer to GEICO – \$158.70

Vehicle insurance premium.

Statement above is confirmed.

November 13, 2023 – Cash Withdrawal – \$3,000.00

I do not recall the purpose of this withdrawal. See general note regarding cash withdrawals.

November 20, 2023 – Transfer to Venmo – \$260.00

I do not possess records of this Venmo transaction and do not recall its specific purpose.

Payment made to Robert Goforth for HVAC work at the home we were renting.

November 22, 2023 – Zelle Instant to DEEVS – \$6,346.00

Bi-weekly salary payment to DeAnna Van Senus.

Statement above is confirmed.

November 24, 2023 – Transfer to Venmo – \$260.00

I do not possess records of this Venmo transaction and do not recall its specific purpose.

This does not appear on the Venmo statement.

November 27, 2023 – Transfer to Centaur Account Ending in -8746 – \$11.50

This transfer was made to cover an overdraft and restore the account to a positive balance.

Statement above is confirmed.

I. GENERAL NOTES

Payments to DeAnna Van Senus (DEEVS):

Multiple transactions reflect payments to Ms. DeAnna Van Senus (DEEVS). These represent bi-weekly salary installments pursuant to her independent contractor agreement with Mr. Tsaparas at M Sourcing, providing annual compensation of \$160,000. In some instances, the amounts varied most likely due to reimbursements, back pay, or other adjustments.

Transfers to Peter Alexopoulos:

Certain transactions involved transfers to Mr. Peter Alexopoulos. While I do not recall the specific purpose of each transaction, Mr. Alexopoulos was a longtime friend, business associate and co-defendant in related matters. Transfers were made from time to time in connection with shared expenses, obligations, or as financial assistance to help him meet personal needs.

Cash Withdrawals:

Several transactions reflect cash withdrawals. I do not recall the specific purpose of each withdrawal. Withdrawals were made for various personal and business-related expenses paid in cash, but I am unable to match them to precise expenditures. At the time, I was also responsible for household expenses such as paying the nanny for our child, groceries, and other family costs. I had been advised by counsel that these expenses were exempt under my then-submitted expense report. It was only later that the Court determined such expenses were not exempt.